

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

---

**DAVID HARTLEY and TIMOTHY  
DELISLE**, individually and on behalf of  
all others similarly situated,

Plaintiffs,

v.

**SIG SAUER, INC.,**

Defendant.

---

)  
)  
)  
) Case No. 4:18-cv-00267-HFS  
)  
)  
)  
)  
)  
)  
)  
)  
)

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION SETTLEMENT**

For the reasons set forth in the accompanying Memorandum of Law submitted herewith, Plaintiffs respectfully request that this Court enter an Order: (1) conditionally certifying a class action with respect to the claims against Defendant pursuant to Federal Rules of Civil Procedure Rules 23(a) and 23(b)(3) for the purpose of effectuating a class action settlement of the claims against Defendant; (2) preliminarily approving the settlement; (3) directing notice to Settlement Class Members consistent with the notice plan in the Settlement Agreement; (4) appointing Bonner C. Walsh of Walsh PLLC, Tim E. Dollar of Dollar Burns & Becker, L.C., and Matthew D. Schelkopf of Sauder Schelkopf LLC as Class Counsel; and (5) scheduling a final approval hearing. A [Proposed] Order Preliminarily Approving the Proposed Settlement shall be tendered as an attachment to the Memorandum of Law submitted in support of preliminary approval.

Dated: January 30, 2020

Respectfully Submitted,

/s/ Bonner C. Walsh

Bonner Walsh (admitted *pro hac vice*)

**WALSH PLLC**

1561 Long Haul Road  
Grangeville, ID 83530  
Telephone: (541) 359-2827  
Facsimile: (866) 503-8206  
bonner@walshpllc.com

Tim E. Dollar MO # 33123

**Dollar Burns & Becker, L.C.**

1100 Main Street, Suite 2600  
Kansas City, MO 64105  
(T): (816) 876-2600  
(F): (816) 221-8763  
timd@dollar-law.com

Matthew D. Schelkopf (admitted *pro hac vice*)

**Sauder Schelkopf LLC**

1109 Lancaster Ave.  
Berwyn, PA 19312  
(T): (610) 200-0581  
(F): (610) 421-1326  
mds@sstrialawyers.com

***Proposed Class Counsel***

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that a true and correct copy of the foregoing **PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** was electronically filed on January 30, 2020, using the Court's EC/CMF system, thereby electronically serving it on all counsel of record.

*/s/ Bonner C. Walsh*